

FILED US District Court-UT
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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH
DIVISION

ALVIE J GROVER

(Full Name)

PLAINTIFF

vs.

CIVIL RIGHTS COMPLAINT

(42 U.S.C §1983, §1985)

SIERRA SCHILLING AP&P/WCSD

RICHARD MORRIS AP&P

DAN BLANCHARD AP&P

J. SCHULTZ W.C.S.O

DEFENDANTS

Case: 4:22-cv-00004
Assigned To : Nuffer, David
Assign. Date : 1/18/2022
Description: Grover v. Schilling

A. JURISDICTION

1. Jurisdiction is proper in this court according to:

- a. ☐ 42 U.S.C. §1983
- b. ☐ 42 U.S.C. §1985
- c. ☐ Other (Please Specify) _____

2. NAME OF PLAINTIFF ALVIE J. GROVER
IS A CITIZEN OF THE STATE OF UTAH

PRESENT MAILING ADDRESS: 2588 W 2365 S.
WEST VALLEY CITY, UTAH
84119

3. NAME OF FIRST DEFENDANT SIERRA SCHILLING
IS A CITIZEN OF IVENS, UTAH
(City and State)

IS EMPLOYED AS PSI WRITER / C.O. at AP&P / W.C.S.O.
(Position and Title if Any) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred?

YES ☒ NO ☐. If your answer is "YES" briefly explain.

AGENT SCHILLING WAS EMPLOYED AS A P.S.I. INVESTIGATOR
AND DEPUTY SCHILLING WAS EMPLOYED BY WASHINGTON
COUNTY SHERIFFS OFFICE AS A CORRECTIONAL OFFICER (1-15-20)

4. NAME OF SECOND DEFENDANT RICHARD G. MORRIS
(If applicable)

IS A CITIZEN OF ST GEORGE, UTAH
(City and State)

IS EMPLOYED AS SUPERVISOR at AP&P
(Position and Title if Any) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred?

YES ☒ NO ☐. If your answer is "YES" briefly explain.

AGENT RICHARD G. MORRIS WAS EMPLOYED WITH AP&P
AS A SUPERVISOR OVER AGENT SCHILLING AND SIGNED
OFF ON AGENT SCHILLINGS PSI REPORT ON 1-14-20

5. NAME OF THIRD DEFENDANT DAN BLANCHARD
(If applicable)

IS A CITIZEN OF SALT LAKE CITY, UTAH
(City and State)

IS EMPLOYED AS DIVISION DIRECTOR at AP&P
(Position and Title if Any) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred?

YES X NO _____. If your answer is "YES" briefly explain.

DAN BLANCHARD WAS EMPLOYED AT AP&P AS A
DEPUTY DIRECTOR WHEN HE SIGNED OFF ON A LEVEL II
GRIEVANCE AGAINST AGENT SCHILLING ON 8-8-21.

6. NAME OF FOURTH DEFENDANT J. SCHULTZ
(If applicable)

IS A CITIZEN OF ST GEORGE, UTAH
(city and State)

IS EMPLOYED AS CHIEF at W.C.S.O.
(Position and Title if Any) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred?

YES X NO _____. If your answer is "YES" briefly explain.

DEPUTY SCHULTZ WAS EMPLOYED WITH WASHINGTON COUNTY
SHERIFF'S OFFICE AS CHIEF OVER PURGATORY CORRECTIONAL
FACILITY, THE HEAD OVER DEPUTY SCHILLING'S DEPARTMENT.

(Use additional sheets of paper if necessary.)

B. NATURE OF CASE

1. Why are you bringing this case to court? Please explain the circumstances that led to the problem.

THIS CASE IS ABOUT THE VIOLATION OF MY RIGHT TO DUE
PROCESS IT ENTAILS THE CONFLICT OF INTEREST BETWEEN
AP&P AND W.C.S.O THERE IS ALSO ELEMENTS OF MISCONDUCT
WALL
AND THE BLUE LINE AND AN ATTEMPTED COVER-UP.

NOTE: SEE SUPPLEMENTAL PAGES

C. CAUSE OF ACTION

1. I allege that my constitutional rights, privileges or immunities have been violated and that the following facts form the basis for my allegations: (If necessary you may attach additional pages)

a. (1) Count I: VIOLATION OF MY RIGHT TO DUE PROCESS

- (2) Supporting Facts: (Describe exactly what each defendant did or did not do. State the facts clearly in your own words without citing legal authority or arguments.)

AGENT SCHILLING REFUSED TO DELIVER A
LETTER WRITTEN BY ME ADDRESSED TO THE
JUDGE WHICH INCLUDED A CD FULL OF CRIME
SCENE PICTURES AND MEDICAL RECORDS
INTENDED FOR ALL INVOLVED.

NOTE: SEE SUPPLEMENTARY PAGES

b. (1) Count II: CONFLICT OF INTEREST (BIAS)

- (2) Supporting Facts: AGENT SCHILLING, AS AN AP&P WRITER
WAS IN DIRECT CONFLICT WITH HER EMPLOYMENT
WITH THE W.C.S.O., WHERE THE K-9 WHO HAD
BEEN SHOT WAS ALSO A MEMBER.

NOTE: SEE SUPPLEMENTARY PAGES.

c. (1) Count III: MISSONDUCT / UNPROFESSIONAL
BEHAVIOR.

(2) Supporting Facts: DEPUTY SCHILLING CAME TO MY
CELL DOOR IN A LEVEL ONE / LOCK-DOWN UNIT
TO INTERVIEW ME FOR A COURT ORDERED PSI.
DEPUTY SCHILLING STARTED AN ARGUMENT WITH ME
AND STATED THAT I DESERVED TO BE SHOT.
SEE SUPPLEMENTRY PAGES.

D. INJURY

1. How have you been injured by the actions of the defendant(s)?

BECAUSE OF AGENT SCHILLING'S PSI I WENT TO
PRISON WHERE I STAYED FOR 20 MONTHS,
AS HER PSI FOLLOWED ME TO THE BOARD
OF PARDONS AND PAROLE. HER PSI MAKES
ME OUT AS A CRAZED PSYCHOPATH.
NOTE: SEE SUPPLEMENTRY PAGES.

E. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF

1. Have you filed other lawsuits in state or federal court that deal with the same facts that are involved in this action or otherwise relate to the conditions of your imprisonment?
YES X / NO _____. If your answer is "YES," describe each lawsuit. (If there is more than one lawsuit, describe additional lawsuits on additional separate pages, using the same outline.)

- a. Parties to previous lawsuit:

Plaintiff(s): STATE OF UTAH

Defendant(s): ALVIE JARED GROVER

- b. Name of court and case or docket number: APPELLATE COURT CASE NO.
20190357

- c. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) ORAL ARGUMENTS HELD ON OCT 21ST 2021
- d. Issues raised: AP&P AGENT SIERRA SCHILLING HAD A CONFLICT OF INTEREST, INASMUCH AS AGENT SCHILLING WAS ALSO A PART-TIME W.C.S.D. DEPUTY WHO WROTE A PSI ABOUT AN INJURED W.C.S.D. K-9 - THE SAME DEPARTMENT.
- e. When did you file the ~~PEAL~~ 12 FEBRUARY 2020
APPEAL Date Month Year
- f. When was it (will it be) decided? STILL AWAITING DECISION
2. Have you previously sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in Part C? YES X / NO _____. If your answer is "YES" briefly describe how relief was sought and the results. If your answer is "NO" explain why administrative relief was not sought.
I FIRST WROTE A LETTER TO AP&P AGENT MORRIS ASKING FOR FORMAL GRIEVANCE. WROTE A FORMAL COMPLAINT ABOUT THIS MATTER TO W.C.S.D. INTERNAL AFFAIRS DEPARTMENT. FILED LEVEL 1.2.3 AP&P / D.O.C GRIEVANCE THROUGH MRS JACKIE PINO GRIEVANCE COORDINATOR. I ASK FOR A TRUE AND CORRECT P.S.I AND OR TO FIX THE MISTAKES MADE THEREIN.
NO CHANGES HAVE BEEN MADE TO MY P.S.I. DUE TO 77-18-1-(b)(b)
F. REQUEST FOR RELIEF
1. I believe that I am entitled to the following relief:
FIRST AND FORMOST A NEW P.S.I AND OR AMENDMENTS MADE THEREIN TO REFLECT THE TRUTH ABOUT ME AND WHAT REALLY HAPPENED THE NIGHT I WAS SHOT 19 TIMES BY THE POLICE.
NOTE: SEE SUPPLEMENTARY PAGES.

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint, and that the information contained therein is true and correct. 28 U.S.C. §1746; 18 U.S.C §1621.

Executed at WEST VALLEY CITY on DEC 23 2021.
(Location) (Date)

Steve J. Hoover
Signature